

June 22, 2020

**Via ECF**

The Honorable Gabriel W. Gorenstein  
 United States Magistrate Judge  
 Southern District of New York  
 500 Pearl Street, Courtroom 6B  
 New York, New York 10007

Re: *Ulku Rowe v. Google LLC*, Case No. 1:19-cv-08655 (LGS)(GWG)

Dear Judge Gorenstein,

Following Judge Schofield's May 14 Order in the above-referenced matter (Dkt. No. 39), and Order referring this matter to Your Honor for pre-trial matters (Dkt. No. 45), the parties have continued to confer in an attempt to resolve their disputes regarding discovery.

The parties have recently reached agreement regarding additional ESI search terms for Defendant to run on custodial collections of ESI, and Defendant is currently running those searches and collecting those documents for review. Defendant believes that the process of collecting, processing, and reviewing the results of these additional ESI search terms will take 3-4 weeks, given the press of other business, with the final production of documents continuing through the middle of July. Once this production is complete, Plaintiff will need time to review these documents prior to conducting certain depositions. As previously noted to the Court, the parties would like to conduct certain depositions in person, though parties' counsel are located in New York, and several witnesses are located in California. (Dkt. No. 31, at 2-3.)

Additionally, Caitlin Brown, one of the attorneys for Google principally defending this case has recently accepted a job with the EEOC and has departed Paul Hastings. The withdrawal of her appearance was filed today. This requires another attorney, Sara Tomezsko, to familiarize herself with the case as she joins the team.

The parties therefore jointly request a short extension to the discovery schedule in this matter, revising the Scheduling Order (Dkt. No. 44), as follows:

Description	Current Deadline	Proposed Deadline
Completion of all fact discovery (excluding depositions and requests to admit)	August 4, 2020	September 4, 2020
Service of Interrogatories pursuant to Fed. R. Civ. P. 33	Not set by prior order	August 17, 2020
Completion of Depositions pursuant to Fed. R. Civ. P. 30, 31	Not set by prior order	September 21, 2020
Service of Requests to admit pursuant to Fed. R. Civ. P. 36	Not set by prior order	October 16, 2020
Completion of all expert discovery	September 18, 2020	October 22, 2020
Deadline to meet and confer regarding a schedule for expert disclosures	July 6, 2020	August 21, 2020
Submission of a joint status letter, as outlined in Judge Schofield's Individual Rule IV.A.2	July 6, 2020	August 21, 2020
Date of pre-motion conference	October 8, 2020	November 11, 2020

The parties believe this extension will allow them to complete the additional discovery ordered by the Court, and will allow the current circumstances related to COVID-19 to normalize enough to permit interstate travel, allowing these depositions to take place in person, if possible. To the extent in-person depositions are not feasible, the parties are prepared to complete depositions virtually by the proposed deadline.

This is the second request to extend discovery deadlines in this matter.

The parties thank the Court for its consideration of this matter.

Respectfully submitted,

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cc: All parties (via ECF)